

Montana Women Involved in Farm Economics (MT WIFE)
Respectfully submits the following comments for review by the
USDA/APHIS

Mary Ann Murray, Beef Chairman, Montana WIFE

1. The Draft Strategic Plans calls for making the entire system mandatory by January 2009. Is a Mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

WIFE opposes mandatory animal identification. WIFE feels the program should remain voluntary. WIFE does not feel it is necessary for the health of the livestock industry in the United States. The United States has been able to trace animals back with existing health certificates and brands in the brand states. It will also be extremely costly and there has never been a cost benefit risk analysis done.

2. In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuing compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.

WIFE opposes mandatory animal identification, however if such legislation is enacted all costs shall be funded through the Department of Home Land Security. WIFE feels the existing method of tracing animals has been adequate.

3. In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites; which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms?

Yes, however; WIFE asks a cost benefit risk analysis be to see if NAIS would be beneficial to those paying for the implementation of the program.

4. The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? How can these types of transactions be inputted into NAIS to obtain the necessary information I the least costly, most efficient manner?

Who will be in charge of compliance? This would make a difference as if the buyer were the one to input the movement, how would you make sure it was done. If he wanted to alleviate his responsibility and he knew there would be another owner before slaughter then he could not report the movement and there would be no connection to him if there was a need for trace back. On the other hand, there are times when cattle are sold and leave your area without you knowing their destination. The destination is sometimes decided in route. Some method to verify submission should be addressed.

5. USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely trace back capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.

The likelihood of losing the tag and it having to be replaced with an entirely different number is much greater the earlier the tagging is done. On the other hand, no one will want to tag just as you are loading them on a truck as they will have to be individually head caught and this takes time and cost plenty of money via shrink. This cost is far greater than the actual cost of the tags and equipment to implement.

6. Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.

Too aggressive as WIFE asks a cost benefit risk analysis be done to see if individual animal identification would be beneficial to those who would be paying for the implementation of the program. WIFE recommends the first step in any U.S. identification program must be to give all imported animals a permanent identification mark. There are too many unanswered questions such as the confidentiality of the program. Pilot programs have been funded which are not up and running and will not have their kinks worked out to know what might be the most feasible. Many other countries do not move and change ownership and premises as frequently as we do here in the United States with our livestock.

7. Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give reasons for your response.

It must be implemented for all species at the same time or you would be giving an advantage to one specie over the other as this will be costly and this is unacceptable. All inputs have gone up much faster than income and this puts an unfair burden on the industry which has been mandated to do so.

8. What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from herd management computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

There should be multiple ways to input information as producers all across the United States have access to different forms of communication. There are areas where electricity and phone service is still not available. There are also places where it is a great distance even to a mailbox and the mail does not run on a daily basis. It must be flexible.

9. We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

All information is confidential including the premises and contact person information. Only information needed to trace a specific health concern should be accessed and then only by those doing the investigation.

10. The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

The buyer and the seller reporting the movement doubles the information, however; what about the enforcement and the assurance or verification that the information has been submitted? Some form of verification needs to be addressed.

11. A key issue in the development of the NAIS concerns the management of animal tracking information. Animal health officials must have immediate, reliable, and uninterrupted access to essential NAIS information for routine surveillance activities and in the event of a disease outbreak. APHIS determined that this goal could best be achieved by having the data repositories managed by AHPIS. The Draft Program Standards document provides for two main NAIS information repositories: The National Premises Information Repository and the National Animal Records Repository. The National Premises Information Repository would maintain data on each production and animal holding location (contact name, address, phone number, type of operation, etc.). The National Animal Records Repository would maintain animal identification and movement data. Recently, however, an industry-led initiative suggested a privately managed database as an alternative for the management of data on animal tracking in the NAIS. The industry group stated that a private database would ensure that the needs of both government and industry would be maintained in a secure and confidential manner. APHIS is requesting comment from stakeholders regarding the utility of a privately managed database for holding animal location and movement information. Among the issues you may wish to comment on are the following:

a.) How should a private database system be funded? Please give the reasons for your response.

WIFE opposes mandatory animal identification, however if such legislation is enacted all costs shall be funded through the Department of Home Land Security. This should not be an additional, but money that has been appropriated to this fund. Turning NAIS over to private industry and making it mandatory just makes the producer a captive consumer. What is meant by “routine surveillance activities”?

b.) Should the NAIS allow for multiple privately managed databases? Please explain why or why not.

If there are **any** privately held databases then there should be **multiples**. Health inspection and brand agencies would be acceptable. Most of these agencies are not privately held.

c.) Should a public (government) system be made available as well as a privately managed system so that producers would have a choice? Please give the reasons for your response.

WIFE states that if such legislation is enacted all costs should be funded through the Department of Home Land Security. The reason for this is in the United States we have been able to trace our animal health issues. If this truly is part of a security issue, then, this is the department that should fund the entire program.

d.) Should a privately managed system include all species? Please give the reasons for your response.

If it applies to one, it must apply to all.

e.) Would either system work equally well at the State level? Please explain why or why not.

Existing programs have worked well in the past. Why wouldn't they work in the future? There still needs to be a cost, benefit, risk analysis done to see if the cost of the program will be any more beneficial than what already exists.

